

EXHIBIT A

KOHAN ADMIN INC. v. LUKE KOHAN, et al.
PORTIONS OF THIS TRANSCRIPT ARE ATTORNEYS' EYES ONLY 9/19/2023

1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4 ADMIN INC., d/b/a PARO,)
5 INC., a Delaware)
6 Corporation,)
7 Plaintiff,)
8 vs.) Case No. 1:22-cv-04430
9 LUKE KOHAN, an individual,) Judge Franklin U.
10 and FIRMKEY SOLUTIONS,) Valderrama
11 LLC, a Minnesota limited) Magistrate Judge M.
12 liability company,) David Weisman
13 Defendants.)
14
15 The deposition of LUKE KOHAN,
16 called by the Plaintiffs for examination, taken
17 pursuant to the Federal Rules of Civil Procedure
18 of the United States District Courts pertaining to
19 the taking of depositions, taken before Robin M.
20 CHIMNIAK, CSR, RMR, CLNR, taken at Two North
21 LaSalle Street, 17th Floor, Conference Room N,
22 Chicago, Illinois, on the 19th day of September,
23 2023, at the hour of 8:33 a.m.
24
25
26 STENOGRAPHICALLY REPORTED BY:
27 Robin M. CHIMNIAK, CSR, RMR
28 State of Illinois CSR License No. 084-001999

KOHAN ADMIN INC. v. LUKE KOHAN, et al.
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2

1 PRESENT:

2 NEAL, GERBER & EISENBERG
3 CHAD W. MOELLER, ESQ.
4 COLLETTE WOGHIREN, ESQ.
5 Two North LaSalle Street
6 Suite 1700
7 Chicago, Illinois 60602
8 312.269.8000
9 CMoeller@nge.com
10 CWoghiren@nge.com

Appeared on behalf of the
Plaintiffs;

11 AKERMAN, LLP
12 THOMAS G. PASTERNAK, ESQ.
13 71 South Wacker Drive
14 46th Floor
15 Chicago, Illinois 60606
16 312.870.8019
17 Thomas.pasternak@akerman.com

Appeared on behalf of the
Defendants.

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ADMIN INC. v. LUKE KOHAN, et al.
KOHAN PORTIONS OF THIS TRANSCRIPT ARE ATTORNEYS' EYES ONLY 9/19/2023

3

1 I N D E X

2 WITNESS	3 PAGE
4 LUKE KOHAN	
5 Examination By Mr. Moeller	5
6 (Question Certified	156
7 Examination By Mr. Pasternak	209
8 Further Examination By Mr. Moeller	211
9 QUESTION CERTIFIED	
10 PAGE	LINE
11 157	20
12 QUESTION ANSWERED	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	

10 E X H I B I T S

11 KOHAN	12 PAGE
13 NUMBER	14 MARKED
15 1	15
16 2	54
17 3	69
18 4	117
19 5	139
20 6	148
21 7	158
22 8	163
23 9	183
24 10	195

KOHAN ADMIN INC. v. LUKE KOHAN, et al.
PORTIONS OF THIS TRANSCRIPT ARE ATTORNEYS' EYES ONLY 9/19/2023

4

1	ATTORNEYS' EYES ONLY	
2		PAGE
3	Beginning of attorneys' eyes only	88
4	End of attorneys' eyes only	98
5	Beginning of attorneys' eyes only	172
6	End of attorneys' eyes only	184
7	Beginning of attorneys' eyes only	196
8	End of attorneys' eyes only	197
9	beginning of attorneys' eyes only	204
10	End of attorneys' eyes only	206
11	Beginning of attorneys' eyes only	206
12	End of attorneys' eyes only	219
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		

1 relating to the prospective experts that would be
2 matched with the specific client requisition?

3 A. Occasionally, but not often.

4 Q. Okay. Does -- while you were at Paro,
5 did the company consider the identities of its
6 clients to be confidential?

7 A. I'm not sure.

8 Q. Did you consider them to be confidential?

9 A. Not entirely.

10 Q. Okay. Did you consider the identities
11 of Paro's experts to be confidential?

12 A. No.

13 Q. Did you consider any information at
14 Paro, while you worked there, to be confidential
15 to Paro?

16 A. Yes.

17 Q. What type of information?

18 A. Information about other employees.

19 Q. Okay. Such as what? Compensation?

20 A. Sure. Compensation, monthly
21 commissions.

22 Q. All right. Any other information at
23 Paro that you consider to be confidential to Paro?

24 A. Yes and no. And I say "yes and no,"

ADMIN INC. v. LUKE KOHAN, et al.
KOHAN PORTIONS OF THIS TRANSCRIPT ARE ATTORNEYS' EYES ONLY 9/19/2023

171

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15 Q. Do you recall which expert or vendor
16 was assigned to the [REDACTED]
17 engagement?

18 A. Yes.

19 Q. Who was it?
20 [REDACTED]
21
22

23 MR. PASTERNAK: And we're designating
24 attorneys' eyes only on these expert

172

1 questions.

2 (Beginning of attorneys' eyes
3 only.)

4 MR. MOELLER: On what basis? He just
5 testified that he doesn't consider the
6 identities of experts to be confidential.

7 MR. PASTERNAK: He doesn't want your
8 client to know about them.

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